

TASHA PARIS CHALFANT (SBN 207055)  
THE LAW OFFICE OF TASHA PARIS CHALFANT  
5701 Lonetree Blvd., Suite 312  
Rocklin, California 95765  
Phone: (916) 444-6100  
Fax: (916) 930-6093  
E-mail: [tashachalfant@gmail.com](mailto:tashachalfant@gmail.com)

KRESTA NORA DALY (SBN 199689)  
BARTH DALY LLP  
P.O. Box F  
Winters, California 95694  
Phone: (916) 440-8600  
Fax: (916) 440-9610  
E-mail: [kdaly@barth-daly.com](mailto:kdaly@barth-daly.com)

Attorneys for Defendant  
BRADLEY EARL REGER

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	No. 2:23-cr-0177 TLN
	)	
Plaintiff,	)	STIPULATION REGARDING
	)	EXCLUDABLE TIME PERIODS UNDER
v.	)	SPEEDY TRIAL ACT; FINDINGS AND
	)	ORDER
BRADLEY EARL REGER,	)	
	)	
Defendant.	)	

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record Assistant United States Attorneys CHRISTINA McCALL and ROGER YANG, and the Defendant, BRADLEY EARL REGER, by and through his counsel of record TASHA PARIS CHALFANT and KRESTA NORA DALY, hereby stipulate and request that the Court make the following findings and Order as follows:

STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE

AND FOR EXCLUSION OF TIME

1           1.       By previous order, this matter was set for a status conference before Judge Troy L.  
2 Nunley on May 1, 2025, with time excluded to that date.

3           2.       By this stipulation, the defendant now moves to continue the status conference until  
4 May 15, 2025, and to exclude time between May 1, 2025, and May 15, 2025, under Local Code  
5 T4. Plaintiff does not oppose this request.

6           3.       The parties agree and stipulate, and request that the Court find the following:

7           a.       The government has represented that the discovery associated with this case will  
8 be voluminous and provided over periodic productions. To date, we have received approximately  
9 400,000 pages which includes both protected and unprotected discovery such investigative reports  
10 in electronic form, as well as a voluminous amount of audio/video and native files.  
11

12           b.       Counsel for the defendant desires additional time to review the voluminous  
13 discovery, develop the case, conduct investigation, consult with their client, discuss potential  
14 resolution, and to explain the consequences and guidelines. Both defense counsel are now  
15 unavailable on May 1, 2025 and discussed this issue with the government.  
16

17           c.       Counsel for the defendant believes that failure to grant the above-requested  
18 continuance would deny them the reasonable time necessary for effective preparation, taking into  
19 account the exercise of due diligence.  
20

21           d.       The government does not object to the continuance.

22           e.       Based on the above-stated findings, the ends of justice served by continuing the  
23 case as requested outweigh the interest of the public and the defendant in a trial within the original  
24 date prescribed by the Speedy Trial Act.  
25

26           f.       For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
27

28           STIPULATION AND [PROPOSED] ORDER FOR CONTINUANCE OF STATUS CONFERENCE

          AND FOR EXCLUSION OF TIME

et seq., within which trial must commence, the time period of May 1, 2025, to May 15, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

All counsel has reviewed this proposed order and authorized Tasha Chalfant to sign it on their behalf.

IT IS SO STIPULATED.

Dated: March 14, 2025

by: /s/Tasha Chalfant for  
CHRISTINA McCALL  
Assistant U.S. Attorney  
Attorney for Plaintiff

Dated: March 14, 2025

by: /s/Tasha Chalfant for  
ROGER YANG  
Assistant U.S. Attorney  
Attorney for Plaintiff

Dated: March 14, 2025

by: /s/Tasha Chalfant  
TASHA CHALFANT  
Attorney for Defendant  
BRADLEY EARL REGER

Dated: March 14, 2025

by: /s/Tasha Chalfant for  
KRESTA NORA DALY  
Attorney for Defendant  
BRADLEY EARL REGER


STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE AND FOR  
EXCLUSION OF TIME

**ORDER**

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order. Based on the stipulation of the parties and the recitation of facts contained therein, the Court finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds that the ends of justice to be served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial.

The Court orders that the time from the date of the parties' stipulation, May 1, 2025, to and including May 15, 2025, status conference hearing date shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C §3161(h)(7)(A) and (B) (iv), and Local Code T4 (reasonable time for defense counsel to prepare). It is further ordered that the presently set May 1, 2025, status conference shall be continued to May 15, 2025, at 9:30 a.m.

IT IS SO FOUND AND ORDERED this 17th day of March, 2025.

  
\_\_\_\_\_  
Troy L. Nunley  
Chief United States District Judge

STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE AND FOR  
EXCLUSION OF TIME